

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

**SUPPLEMENTAL DECLARATION OF STEPHANIE ACKERMAN IN SUPPORT OF
TRUSTEE'S SUPPLEMENTAL MOTION AND MEMORANDUM OF LAW TO
AFFIRM HIS DETERMINATIONS DENYING CLAIMS OF CLAIMANTS
HOLDING INTERESTS IN RICHARD B. FELDER AND DEBORAH
FELDER TENANCY IN COMMON**

I, Stephanie Ackerman, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an associate with Baker & Hostetler LLP, counsel to Irving H. Picard, trustee ("Trustee") for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC ("BLMIS") under the Securities Investor Protection Act, 15 U.S.C. § 78aaa et seq. ("SIPA"), and for Bernard L. Madoff.

2. I am fully familiar with this case and the facts set forth herein.

3. I submit this declaration in support of the Trustee's Supplemental Motion and Memorandum of Law to Affirm His Determinations Denying Claims of Claimants Holding Interests in Richard B. Felder and Deborah Felder Tenancy In Common (the "Supplemental

Motion”). To the extent they are inconsistent, this declaration supplements and amends the Declaration of Stephanie Ackerman in support of the Trustee’s Motion and Memorandum to Affirm His Determinations Denying Claims of Claimants Holding Interests in Judy L. Kaufman et al. Tenancy In Common, Richard B. Felder and Deborah Felder Tenancy In Common, and Keith Schaffer, Jeffrey Schaffer, Carla R. Hirschhorn Tenancy In Common. ECF No. 14846 (Jan. 13, 2017).

4. A list of objecting claimants associated with the Felder Tenancy in Common is contained in Exhibit 2 (the “Felder Objecting Claimants”) to the Declaration of Vineet Sehgal filed in support of the Trustee’s Motion and Memorandum to Affirm His Determinations Denying Claims of Claimants Holding Interests in Judy L. Kaufman et al. Tenancy In Common, Richard B. Felder and Deborah Felder Tenancy In Common, and Keith Schaffer, Jeffrey Schaffer, Carla R. Hirschhorn Tenancy In Common (the “Sehgal Declaration”). ECF No. 14845 (Jan. 13, 2017). The Supplemental Motion addresses the outstanding docketed objection to the Trustee’s determination of claims filed by the Felder Objecting Claimants, details of which are contained in Exhibits 2 and 3 to the Sehgal Declaration.

5. I supervised service of discovery, including Requests for Admissions, by the Trustee on the Objecting Claimants listed in Exhibit 2 to the Sehgal Declaration. I also personally reviewed and caused to be entered into our system each response to Requests for Admissions or to Interrogatories that were received by our office.

6. During the course of my work on this matter, and to properly prepare and serve discovery, I personally reviewed hundreds of documents, including the claims filed by the Objecting Claimants, the respective notices of determination of claims issued by the Trustee, and the respective objections to the Trustee’s notices of determination of claims filed by the

Objecting Claimants, in addition to reviewing the Tenancy in Common account files as contained in the books and records of BLMIS.

7. The objection to determination of claims filed on behalf of the Felder Objecting Claimants was filed by Jeffrey D. Felder, Esq.

8. I caused discovery to be served on the Felder Objecting Claimants through counsel using contact details from the claims, objections to the Trustee's notices of determination of claims, or the debtor's books and records, all as provided by the Trustee's claims agent, AlixPartners LLP. Each of the Trustee's discovery requests contained a certificate of service setting out how and when service was made.

9. Attached hereto as Exhibit 1 is a true and correct copy of the Felder Objecting Claimants' responses to the Requests for Admissions and Requests for Interrogatories served by the Trustee on Jeffrey D. Felder, Esq. Also attached are true and correct copies of the cover letter and the Trustee's certificate of service as served upon Mr. Felder.

10. Attached hereto as Exhibit 2 is a true and correct copy of the Felder Objecting Claimants' responses to the Requests for Production of Documents served by the Trustee on Jeffrey D. Felder, Esq., and true and correct copies of all documents produced. Also attached is a true and correct copy of the Trustee's certificate of service as served upon Mr. Felder.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 15, 2017
New York, New York

/s/ Stephanie Ackerman
Stephanie Ackerman
Baker & Hostetler LLP
45 Rockefeller Plaza
New York, New York 10111